



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

February 11, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: J.M. Hutton and Company / T177-17509-00083

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**J.M. Hutton and Co., Inc.**  
**1501 South 8<sup>th</sup> Street**  
**1117 North E Street**  
**Richmond, Indiana 47375**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70, Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T177-17509-00083	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 11, 2004  Expiration Date: February 11, 2009

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary burial casket manufacturing company, which includes surface coating and construction.

Responsible Official:	A.B. Wright - Vice President
Source Address:	1501 South 8 <sup>th</sup> Street, Richmond, Indiana 47375; and 1117 North E Street, Richmond, Indiana 47375
Mailing Address:	P.O. Box 129 Richmond, Indiana 47375-0129
General Source Phone Number:	(765) 962-3591
SIC Code:	3995
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This burial casket constructing company and surface coating operation consists of two (2) plants:

- (a) Plant 1 is located at 1501 South 8<sup>th</sup> Street, Richmond, Indiana 47375; and
- (b) Plant 2 is located at 1117 North E Street, Richmond, Indiana 47375.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of Part 70 permit T177-6466-00083, issued on September 25, 1998.

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Plant 1:

One (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:

- (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively;

- (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.

(b) Plant 2:

- (1) One (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively;
- (2) One (1) wooden casket surface coating line, constructed in 1979, with a maximum capacity of coating two (2) caskets per hour, consisting of three (3) surface coating booths identified as E7, E8, and E9, utilizing High Volume Low Pressure (HVLP) or equivalent application for E7 and E8, and manual hand-wipe application for E9, exhausting to stacks E007, E008, and E009, respectively; and
- (3) One (1) spray coating booth, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1. [326 IAC 6-2-4]
- (b) One (1) 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2. [326 IAC 6-2-4]
- (c) One (1) 0.38 MMBtu/hr steam-generating wood-fired boiler, installed in 1973, located at Plant 2. [326 IAC 6-2-3]
- (d) One (1) woodworking operation located at Plant 2, with emissions controlled by two (2) cyclones. [326 IAC 6-3-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).



## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source,

except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by U.S. EPA.

**B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and



- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The Commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the Commissioner or U.S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon permit issuance of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated upon permit issuance, the Permittee may extend the compliance schedule related to the equipment for ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3; 40 CFR 60, Appendix A; 40 CFR 60, Appendix B; 40 CFR 63; or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 22, 1996.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

**C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the Permittee shall promptly notify IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6] [326 IAC 2-7-19 (e)]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source;
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**



- 
- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
  - (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## **Part 2 MACT Application Submittal Requirement**

### **C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]**

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- (a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
  - (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
  - (2) The source no longer includes one or more units in an affected source category for which U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
  - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

(a) Plant 1:

One (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:

- (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively;
- (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.

(b) Plant 2:

- (1) One (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively;
- (2) One (1) wooden casket surface coating line, constructed in 1979, with a maximum capacity of coating two (2) caskets per hour, consisting of the following:
  - (A) Two (2) surface coating booths, identified as E7 and E8, utilizing High Volume Low Pressure (HVLP) or equivalent application, and exhausting to stacks E007 and E008, respectively; and
  - (B) One (1) surface coating booth, identified as E9, utilizing manual hand-wipe application, and exhausting to stack E009.
- (3) One (1) surface coating booth, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to T177-6466-00083, issued on September 25, 1998, the use of VOC, including coatings, dilution solvents, and cleaning solvents at all surface coating booths (S1, S2, S3, S4, S5, S6, S9, E1, E2, E3, E4, E6, E7, E8, and E9) shall be less than two hundred forty-nine and seven tenths (249.7) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than two hundred fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products). The Permittee shall comply with these requirements on and after the effective date of 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products).
- (b) Since the applicable requirements associated with the compliance options are not included and not specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M]

- (a) The affected source is subject to the provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products), effective January 2, 2004. Pursuant to 40 CFR 63.3883(b), the Permittee shall comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and not specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart M, pursuant to 40 CFR 63.3882:
  - (1) One (1) metal casket surface coating line, located in Plant One, consisting of the following:
    - (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVL) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively;
    - (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.
  - (2) One (1) metal casket surface coating line, located in Plant 2, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVL) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively;
  - (3) One (1) surface coating booth, located in Plant 2, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVL) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.

- (d) The definitions of 40 CFR 63, Subpart Mmmm at 40 CFR 63.3981 are incorporated by reference.

**D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]**

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- (a) Pursuant to CP-177-3462-00054, issued September 27, 1994, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the VOC emission from the metal casket surface coating line, located at Plant 1, consisting of seven (7) surface coating booths, identified as S1, S2, S3, S4, S5, S6, and S9, shall utilize Best Available Control Technology (BACT) in accordance with 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and comply with the following requirements:
- (1) Utilize six (6) High Volume Low Pressure (HVLP) or equivalent spray guns and one (1) electrostatic airless spray gun with a minimum transfer efficiency of 65% for each spray gun.
  - (2) High Volume Low Pressure (HVLP) or equivalent spray guns and/or the electrostatic airless spray gun shall be used at all times that the coating line is operated.
- (b) Pursuant to CP-177-3461-00053, issued October 25, 1994, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the metal casket surface coating line, located at Plant 2, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, shall utilize Best Available Control Technology (BACT) in accordance with 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and comply with the following requirements:
- (1) Utilize High Volume Low Pressure (HVLP) or equivalent application equipment at all times that the booths are in operation, with the exception of shading operations.  
  
(HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.)
  - (2) Air atomization equipment may be used for shading operations (shading involves the application of a narrow line of coating on the casket).
  - (3) Water base primer shall be used for all primer applications due to the significantly reduced concentrations of VOC.
- (c) The input VOC usage to the surface coating booth, identified as E6, located at Plant 2, shall not exceed twenty-five (25.0) tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents. Any change or modification which may increase potential emissions in excess of twenty-five (25.0) tons per year shall be subject to the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 (New Facilities; General Reduction Requirements). Based on this limitation, 326 IAC 8-1-6 does not apply.

**D.1.5 Particulate Matter (PM) [40 CFR 52, Subpart P]**

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Pursuant to T177-6466-00083, issued on September 25, 1998, and 40 CFR 52, Subpart P, the PM from the paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### **D.1.6 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by dry particulate filters or equivalent, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

#### **D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each facility and any control devices.

### **Compliance Determination Requirements**

#### **D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.4(c) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.1.9 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters or equivalent control device. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) To monitor the performance of the dry filters or equivalent control device, weekly observations shall be made of the overspray from the surface coating booth stacks S001, S002, S003, S004, S005, S006, S009, E001, E002, E003, E004, E006, E007, E008, and E009 while one or more of the booths are in operation.
- (c) Monthly inspections shall be performed of the coating emissions from each stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (S1, S2, S3, S4, S5, S6, S9, E1, E2, E3, E4, E6, E7, E8, and E9) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.10 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.4(c), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.4(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used, including cleanup solvent.
  - (2) The amount of coating material and solvent, including cleanup solvent, used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The total VOC usage for each month.
- (b) To document compliance with Condition D.1.4(b), the Permittee shall maintain records of MSDS or other manufacturers specifications for the type of primer used during application to ensure the usage of a water based primer.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.4(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### D.1.12 Notifications Requirements [40 CFR 63.3910]

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- (a) Pursuant to 40 CFR 63.3910(a), the Permittee shall submit the notifications in §§ 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the Permittee. The Permittee must submit these notifications by the dates specified in those sections, except as provided in this condition.
- (b) Pursuant to 40 CFR 63.3910(b), the Permittee shall submit the Initial Notification no later than January 2, 2005, one (1) year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) The Permittee shall submit the Notification of Compliance Status required by § 63.9(h) no later than thirty (30) calendar days following the end of the initial compliance period described in § 63.3940, § 63.3950, or § 63.3960 that applies to the affected source. The Notification of Compliance Status must include the information required in § 63.3910(c)(1) through (11) and in § 63.9(h).

#### D.1.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

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The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the notification of compliance status in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than April 2, 2006, nine (9) months prior to the compliance date of 40 CFR 63, Subpart MMMM.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015



## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1.
- (b) One (1) 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2.
- (c) One (1) 0.38 MMBtu/hr steam-generating wood-fired boiler, installed in 1973, located at Plant 2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the 0.38 MMBtu per hour heat input, steam-generating wood-fired boiler, installed in 1973, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on

- (a) 326 IAC 6-2-3(e). Pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating purposes which has 250 MMBtu/hr heat input or less and which began operation after June 1972, shall in no case exceed 0.6 pounds per MMBtu heat input; and
- (b) the following equation:

$$Pt = \frac{C \cdot a \cdot h}{765 \cdot Q^{0.75} \cdot N^{0.25}}$$

- Where:
- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter ( $\mu\text{m}^3$ ) for a period not to exceed a sixty (60) minute time period.
  - Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
  - Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For this condition, the total source maximum operating capacity rating is 0.38 MMBtu/hr.
  - N = Number of stacks in fuel burning operation. For this condition, the number of stacks is one (1).
  - a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input.
  - h = Stack height in feet. For this condition, the stack height is eighty (80) feet.

#### D.2.2 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1, shall be limited to 0.6 pounds per MMBtu heat input.

- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt \leq \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. For Q greater than or equal to 10,000 MMBtu/hr, Pt shall not exceed 0.1.

As each new indirect heating facility is added to a plant Q will increase. As a result, the emission limitation for each progressively newer facility will be more stringent until the total plant capacity reaches 10,000 MMBtu/hr after which the emission limit for each newer facility will be 0.1 lb/MMBtu heat input. The rated capacities for facilities regulated by 326 IAC 12, New Source Performance Standards, shall be included when calculating Q for subsequent facilities. For Condition D.2.2(a), Q is equal to 6.38 MMBtu/hr. For Condition D.2.2(b), Q is equal to 12.38 MMBtu/hr.

### SECTION D.3 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)]

One (1) woodworking operation located at Plant 2, with emissions controlled by two (2) cyclones.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

##### D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall not exceed 2.1 pounds per hour when operating at a process weight rate of 756 pounds per hour.

The pounds per hour limitation is based on the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

##### D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the woodworking operation and the two (2) cyclones.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: J.M. Hutton and Co., Inc.  
Source Address: 1501 South 8<sup>th</sup> Street, and 1117 North E Street, Richmond, Indiana 47375  
Mailing Address: P.O. Box 129, Richmond, Indiana 47375  
Part 70 Permit No.: T177-17509-00083

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ? Annual Compliance Certification Letter
- ? Test Result (specify) \_\_\_\_\_
- ? Report (specify) \_\_\_\_\_
- ? Notification (specify) \_\_\_\_\_
- ? Affidavit (specify) \_\_\_\_\_
- ? Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE BRANCH**  
**100 North Senate Avenue**  
**P.O. Box 6015**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: J.M. Hutton and Co., Inc.  
Source Address: 1501 South 8<sup>th</sup> Street, and 1117 North E Street, Richmond, Indiana 47375  
Mailing Address: P.O. Box 129, Richmond, Indiana 47375  
Part 70 Permit No.: T177-17509-00083

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p>? This is an emergency as defined in 326 IAC 2-7-1(12)</p> <p>? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</p> <p>? The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</p> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: J.M. Hutton and Co., Inc.  
Source Address: 1501 South 8<sup>th</sup> Street, and 1117 North E Street, Richmond, Indiana 47375  
Mailing Address: P.O. Box 129, Richmond, Indiana 47375  
Part 70 Permit No.: T177-17509-00083  
Facility: Total Source (All Surface Coating Lines)  
Parameter: VOC Usage  
Limit: Less than 249.7 tons per consecutive 12 month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: J.M. Hutton and Co., Inc.  
Source Address: 1501 South 8<sup>th</sup> Street, and 1117 North E Street, Richmond, Indiana 47375  
Mailing Address: P.O. Box 129, Richmond, Indiana 47375  
Part 70 Permit No.: T177-17509-00083  
Facility: E6, located at Plant 2  
Parameter: VOC Input  
Limit: 25.0 tons per consecutive 12 month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: J.M. Hutton and Co., Inc.  
Source Address: 1501 South 8<sup>th</sup> Street, and 1117 North E Street, Richmond, Indiana 47375  
Mailing Address: P.O. Box 129, Richmond, Indiana 47375  
Part 70 Permit No.: T177-17509-00083

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management

## Office of Air Quality

### Addendum to the Technical Support Document for a Part 70 Operating Permit Renewal

Source Name: J.M. Hutton and Co., Inc.  
Source Location: 1501 South 8<sup>th</sup> Street, Richmond, Indiana 47375  
1117 North E Street, Richmond, Indiana 47375  
County: Wayne  
SIC Code: 3995  
Operation Permit No.: T177-17509-00083  
Permit Reviewer: Chrystal Wagner

On September 11, 2003, the Office of Air Quality (OAQ) had a notice published in the Palladium Item, Richmond, Indiana, stating that J.M. Hutton and Co., Inc. had applied for a Part 70 Operating Permit Renewal to operate a stationary burial casket manufacturing company, which includes surface coating and construction of caskets. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 10, 2003, Colombe Miller, Trinity Consultants, on behalf of J.M. Hutton and Co., Inc., submitted comments on the proposed Part 70 permit renewal.

On October 24, 2003, OAQ had a second notice published in the Palladium Item, Richmond Indiana, stating that J.M. Hutton and Co., Inc. is affected by newly promulgated standards under 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Miscellaneous Metal Parts and Products). OAQ published revisions to the proposed permit regarding the new standards. Interested parties were informed in the notice that there was a thirty (30) day period to comment on the proposed revision. The notice stated that only those comments pertaining to Conditions D.1.2, D.1.3, D.1.12, and D.1.13 of the proposed permit would be addressed.

On November 20, 2003, Colombe Miller, Trinity Consultants, on behalf of J.M. Hutton and Co., Inc., submitted comments on Condition D.1.13 of the proposed Part 70 permit renewal. Comments submitted during this comment period are noted with an asterisk (\*).

Upon further review, OAQ has made the following revisions to the permit (**bolded** language has been added, ~~struck~~ language has been deleted). The Table of Contents has been modified to reflect these changes.

### **SECTION C**

OAQ has made the following change to Section C. This change is not the result of public comments received during a comment period. OAQ received comments regarding these conditions in other permits and believes that the new conditions more accurately reflect the applicable requirements.

#### **Change C-1:**

Condition C.14 - Compliance Response Plan - Preparation, Implementation, Records, and Reports has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to

demonstrate compliance with applicable requirements.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, **the Permittee shall promptly notify IDEM, OAQ** ~~shall be promptly notified~~ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously

submitted a request for a minor permit modification to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

#### **Section D**

##### **Comment 1\*:**

J.M. Hutton requests that the requirement to submit a significant permit modification application within 27 months after the effective date of 40 CFR 63, Subpart Mmmm be removed. It is understood that a significant permit modification application must be submitted in a timely manner in order for IDEM to establish federally enforceable limits allowing facilities to opt out of major HAP status. If a facility does not request a federally enforceable limit, J.M. Hutton believes that the routine submittal of the renewal application will incorporate the requirements specified in Subpart Mmmm in a sufficient time frame. J.M. Hutton believes the submittal of a Part 70 permit renewal application as the vehicle for incorporating specific Subpart Mmmm provisions into the Part 70 permit is sufficient for the following reasons:

- (a) J.M. Hutton is not required to comply with Subpart Mmmm until three (3) years (36 months) after the effective date. J.M. Hutton has not decided upon a Subpart Mmmm compliance method given the options in the final rule. J.M. Hutton may be no closer to determining a Subpart Mmmm compliance method within 27 months after the effective date than we are today. Hence, the entirety of Subpart Mmmm (with all compliance options listed) could be included in the current proposed Part 70 Operating Permit Renewal and still contain as much definitive information as a significant modification application 27 months from now.
- (b) Section D.1.3 clearly specifies that Subpart Mmmm is applicable to the Richmond Plant; therefore, J.M. Hutton feels that IDEM can rely on this section (to require J.M. Hutton's Subpart Mmmm compliance) until a Part 70 permit renewal application is submitted.
- (c) Although dependent on the effective date of Subpart Mmmm, it is likely that J.M. Hutton's Part 70 permit will have less than three (3) years remaining once the first substantive Subpart Mmmm compliance requirement occurs (besides the initial notification). Per 326 IAC 2-7-9, IDEM is not obligated to reopen a Part 70 permit to add additional applicable

requirements (i.e., Subpart Mmmm requirements) unless the Part 70 remaining term is three (3) or more years. J.M. Hutton requests that IDEM exercise its regulatory discretion to not require unnecessary paperwork in the form of a significant modification application given the timelines involved.

Based on these factors, J.M. Hutton believes the requirement to submit a significant permit modification application prior to the submittal of a Part 70 permit renewal application is unnecessary and overly burdensome for both IDEM and J.M. Hutton. Therefore, J.M. Hutton requests that this condition be removed from the proposed Part 70 Operating Permit Renewal.

**Response to Comment 1\*:**

OAQ disagrees. This permit will be valid until 2009. The final rule was published in the Federal Register on January 2, 2004. 40 CFR Part 63, Subpart Mmmm applies to J.M. Hutton as of the effective date of this rule. However, the initial compliance date for the Surface Coating of Miscellaneous Metal Parts and Products NESHAP is not until January 2, 2007. J.M. Hutton has not indicated to IDEM, OAQ its chosen methods for complying with this rule. The Part 70 permit is required to identify all applicable requirements that apply to each emissions unit and to identify how the Permittee will comply with the requirements for each unit.

IDEM, OAQ recognizes that the requirements of 40 CFR 63, Subpart Mmmm are new and that the Permittee most likely does not currently know exactly how it intends to comply with the rule. As a result, it is necessary for the Permittee to modify the permit later to include compliance options that will be chosen, as well as the additional monitoring, record keeping, and reporting requirements for the options chosen. Adding the specific compliance options chosen to the permit will significantly change existing monitoring, record keeping, and reporting terms of the Part 70 permit such that a significant permit modification will be required in accordance with 326 IAC 2-7-12(d)(1). Since these changes will require a significant permit modification, IDEM, OAQ will need nine (9) months to complete the permit modification so it is necessary to submit the application for the modification nine (9) months in advance of the initial compliance date for 40 CFR Part 63, Subpart Mmmm. This condition is required by U.S. EPA whenever a significant portion of a federal rule cannot be incorporated until a later date. The permit has been updated as follows:

**D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart Mmmm]**

- 
- (a) The affected source is subject to the provisions of 40 CFR Part 63, Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products), effective ~~the date the rule is published in the Federal Register~~ **January 2, 2004**. Pursuant to 40 CFR 63.3883(b), the Permittee shall comply with these requirements on and after ~~the date that is three years after the effective date of the rule~~ **January 2, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and not specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart Mmmm, pursuant to 40 CFR 63.3882:
- (1) One (1) metal casket surface coating line, located in Plant One, consisting of the following:

- (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively;
- (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.
- (2) One (1) metal casket surface coating line, located in Plant 2, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively;
- (3) One (1) surface coating booth, located in Plant 2, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.
- (d) The definitions of 40 CFR 63, Subpart Mmmm at 40 CFR 63.3981 are incorporated by reference.

**D.1.12 Notifications Requirements [40 CFR 63.3910]**

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- (a) Pursuant to 40 CFR 63.3910(a), the Permittee shall submit the notifications in §§ 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the Permittee. The Permittee must submit these notifications by the dates specified in those sections, except as provided in this condition.
- (b) Pursuant to 40 CFR 63.3910(b), the Permittee shall submit the Initial Notification no later than **January 2, 2005**, one (1) year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) The Permittee shall submit the Notification of Compliance Status required by § 63.9(h) no later than thirty (30) calendar days following the end of the initial compliance period described in § 63.3940, § 63.3950, or § 63.3960 that applies to the affected source. The Notification of Compliance Status must include the information required in § 63.3910(c)(1) through (11) and in § 63.9(h).

**D.1.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]**

---

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the notification of compliance status in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart Mmmm, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

- (b) The significant permit modification application shall be submitted no later than **April 2, 2006, twenty-seven (27) nine (9) months after prior to the effective compliance** date of 40 CFR 63, Subpart Mmmm.

- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**Comment 2:**

Conditions D.3.3, D.3.4, D.3.5, and D.3.6 are inconsistent with the current permit at this facility, are overly burdensome given the amount of emissions from the woodworking operation, and will put J.M. Hutton at a competitive disadvantage with other casket manufacturers in Indiana.

These conditions are overly burdensome given the amount of emissions possible from the woodworking operation. In the Technical Support Document (TSD) that accompanied the original Part 70 permit issuance, the wood-working operation was identified as an insignificant activity with emissions characterized as below insignificant threshold levels despite the controlled potential to emit, as stated in the TSD, of 12.26 tons per year (tpy) of particulate matter (PM). J.M. Hutton sees no documentation of the origin of the 12.26 tpy emission rate, and no further mention of the woodworking operation is made in either the TSD or the issued September 25, 1998 Part 70 permit. J.M. Hutton believes that this was a likely oversight by IDEM, and that the woodworking operation should have been included at Condition A.3 under Specifically Regulated Insignificant Activities in the original Title V permit. Thus, J.M. Hutton is not contesting IDEM's inclusion of this unit as an insignificant activity in the proposed Part 70 Operating Permit renewal.

In reviewing the recent TSD that supports the proposed Part 70 Operating Permit renewal, IDEM has determined that the two (2) cyclones shall be operating at all times the woodworking is in operation so that compliance with PM emission limitations for manufacturing processes (326 IAC 6-3-2) can be assured. Again, J.M. Hutton does not disagree with IDEM's assessment, and agrees to operate the cyclones when the woodworking is in operation.

However, it is stated by IDEM in the TSD that additional monitoring conditions are necessary "because the unrestricted PTE of the woodworking operation is 43.8 ton PM/yr, and a control is necessary to comply with applicable rules." These monitoring conditions include daily visible notations by a trained employee, an inspection of the cyclone every calendar quarter, and other inspections as prescribed in the Preventive Maintenance Plan, along with the subsequent record keeping of these visible notations and inspections. The emission calculations included by IDEM in support of the 43.8 ton PM/yr emission rate show an uncontrolled hourly emission rate of ten (10) pounds per hour of PM. J.M. Hutton is unaware of the origin of this short-term emission rate used by IDEM. The woodworking operation at the J.M. Hutton Plant 2 facility is designed to produce a maximum of two (2) caskets per hour. Given that the average weight of a typical wood casket is 170 pounds, a total of 340 finished pounds per hour of wood can be processed through the woodworking operation. A reasonable yield factor within the industry is 45%, meaning that 45% of the raw wood brought into the woodworking operation leaves as a finished wood casket. This means that approximately 756 pounds of raw wood per hour is used at the Plant 2 facility ( $340/0.45$ ), and 416 pounds per hour of potential wood waste is generated ( $416 = 756 - 340$ ). Using a conservative SCC factor of 1.2 pounds of PM emissions per ton of total wood waste, an uncontrolled PM emission rate of 0.25 pounds per hour is predicted ( $0.25 = 416/2000 * 1.2$ ). Clearly, the woodworking operation at J.M. Hutton can be considered an insignificant activity, even without the presence of the cyclone, given the minimal amount of emissions generated given the production rate of two caskets per hour.



### Response to Comment 2:

OAQ has verified the data submitted by the Permittee and finds it to be accurate. The updated information has been incorporated into the permit. The following changes have been made to Section D.3:

#### D.3.1 Particulate [326 IAC 6-3-2]

---

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall not exceed ~~3.6~~ **2.1** pounds per hour when operating at a process weight rate of ~~4650~~ **756** pounds per hour.

The pounds per hour limitation is based on the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.3.3 ~~Visible Emissions Notations~~

---

- ~~(a) Daily visible emission notations of the cyclone stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

#### D.3.4 ~~Cyclone Inspections~~

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~~An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~

#### D.3.5 ~~Cyclone Failure Detection~~

---

~~In the event that cyclone failure has been observed: Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~D.3.6 Record Keeping Requirements~~

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- ~~———— (a) ——— To document compliance with Condition D.3.3, the Permittee shall maintain records of daily visible emission notations of the cyclone exhaust.~~
- ~~———— (b) ——— To document compliance with Condition D.3.4, the Permittee shall maintain records of the results of the inspections required under Condition D.3.4 and the dates the vents are redirected.~~
- ~~———— (c) ——— To document compliance with Condition D.3.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~———— (d) ——— All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.~~

# **Indiana Department of Environmental Management Office of Air Quality**

## **Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

### **Source Background and Description**

**Source Name:** J.M. Hutton and Co., Inc.  
**Source Location:** 1501 South 8<sup>th</sup> Street, Richmond, Indiana 47375  
1117 North E Street, Richmond, Indiana 47375  
**County:** Wayne  
**SIC Code:** 3995  
**Operation Permit No.:** T177-17509-00083  
**Permit Reviewer:** Chrystal Wagner

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from J.M. Hutton and Co., Inc. relating to the manufacturing of burial caskets, which includes surface coating and construction.

### **Source Definition**

This casket manufacturing and surface coating company consists of two (2) plants:

- (a) Plant 1 is located at 1501 South 8<sup>th</sup> Street, Richmond, Indiana; and
- (b) Plant 2 is located at 1117 North E Street, Richmond, Indiana.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source, effective from the date of issuance of Part 70 permit T177-6466-00083, issued on September 25, 1998.

### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Plant 1:

One (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:

- (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively.

- (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.
- (b) Plant 2:
  - (1) One (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively.
  - (2) One (1) wooden casket surface coating line, constructed in 1979, with a maximum capacity of coating two (2) caskets per hour, consisting of the following:
    - (A) Two (2) surface coating booths, identified as E7 and E8, utilizing High Volume Low Pressure (HVLP) or equivalent application, and exhausting to stacks E007 and E008, respectively; and
    - (B) One (1) surface coating booth, identified as E9, utilizing manual hand-wipe application, and exhausting to stack E009.
  - (3) One (1) spray coating booth, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu per hour.
  - (1) one (1) 6.0 MMBtu/hr boiler, installed in 1994, located at Plant 1; [326 IAC 6-2-4]
  - (2) one (1) 6.0 MMBtu/hr boiler, installed after 1998, located at Plant 2; [326 IAC 6-2-4]
  - (3) one (1) top-assembly oven located in Plant 1;
  - (4) one (1) water heater located in Plant 1;
  - (5) three (3) 0.15 MMBtu/hr space heaters located in Plant 2;
  - (6) one (1) 0.10 MMBtu/hr space heater located in Plant 2;
- (b) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

- (d) Filter or coalescer media changeout.
- (e) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling towers.
- (f) The following facilities with emissions below insignificant threshold levels:
  - (1) one (1) woodworking operation located at Plant 2, with emissions controlled by two (2) cyclones; [326 IAC 6-3-2]
  - (2) one (1) 0.38 MMBtu/hr steam-generating wood-fired boiler, installed in 1973, located at Plant 2. [326 IAC 6-2-3]

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Administrative Amendment T177-13916-00083, issued on April 12, 2001.
- (b) Part 70 Operating Permit T177-6466-00083, issued on September 25, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

Part 70 Operating Permit T177-6466-00083, issued on September 25, 1998.

Condition: D.1.3 Volatile Organic Compounds [326 IAC 8-2-12]

The wooden casket surface coating line at the plant located at Plant 2, which consists of three (3) booths identified as E7, E8, and E9, is subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). The surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLP	Aerosol Spray Cans

High Volume Low Pressure (HVLP) Spray Application is considered to be an Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Reason not incorporated:

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) does not apply to the wooden casket surface coating line located in Plant 2, because caskets are not considered furnishings.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 26, 2002. Additional information was received on August 14, 2003.

There was no notice of completeness letter mailed to the source.

### Emission Calculations

See Appendix A, pages 1 through 11, of this document for detailed emissions calculations.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions.

Pollutant	Potential To Emit (tons/year)
PM	74.50
PM-10	74.77
SO <sub>2</sub>	0.04
VOC	441.83
CO	5.40
NO <sub>x</sub>	6.12

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Toluene	165.26
Glycol Ethers	68.69
MEK	51.35
Xylene	5.70
MIK	3.59
TOTAL	294.59

- (a) The unrestricted potential emissions of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAP is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.99
PM-10	0.99
SO <sub>2</sub>	--
VOC	54.8
CO	--
NO <sub>x</sub>	--
HAP (specify)	--

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAP
Surface Coating	1.3	1.3	--	249.7	--	--	166.7*
Woodworking	6.6	6.6	--	--	--	--	--
Combustion	0.8	1.0	< 0.1	0.2	5.4	6.0	0.2
Total Emissions	8.7	8.9	< 0.1	249.9	5.4	6.0	166.9

\*Potential to emit HAP after issuance was based on surface coating VOC input of 249.7 tons per year and the percentage of unrestricted HAP emissions per unrestricted VOC emissions.

### County Attainment Status

The source is located in Wayne County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Wayne County has been classified as attainment or unclassifiable for PM-10, SO<sub>2</sub>, NO<sub>2</sub>, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

- (a) The two (2) 6.0 MMBtu/hr natural gas boilers and one (1) steam-generating wood-fired boiler listed as insignificant activities are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40c, Subpart Dc, because their heat input capacities are each less than 10 MMBtu/hr.
- (b) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAP (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAP) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.
  - (1) This rule requires the source to:
    - (A) Submit a Part 1 MACT Application by May 15, 2002; and
    - (B) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 to 40 CFR 63, Subpart B for the affected source category.
  - (2) The Permittee submitted a Part 1 MACT Application on May 13, 2002.
  - (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:



- (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
  - (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
  - (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.
- (c) The wooden casket surface coating line located in Plant 2 is not subject to the requirements of 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), because this source does not belong to any of the affected SIC categories listed in the NESHAP.
- (d) The metal casket manufacturing and surface coating lines are not subject to the requirements of 40 CFR 63, Subpart RRRR (National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture), because this source does not belong to any of the affected SIC categories listed in the NESHAP.
- (e) The surface coating lines have no applicable compliance assurance monitoring (CAM) requirements pursuant to 40 CFR 64.1. CAM does not apply to the surface coating lines because:
  - (1) Each surface coating line has an uncontrolled PTE for particulate matter that is less than 100 tons per year.
  - (2) No control devices for VOC emissions are needed/used to achieve compliance with applicable rules or regulations.
- (f) **Upon completion of the promulgation process, 40 CFR 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) will be incorporated into this Part 70 permit. Subpart MMMM applies to this major source because it uses 250 gallons or more per year of HAP-containing coatings in the surface coating of miscellaneous metal parts or products. The Permittee shall comply with the following:**
  - (1) **The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified in 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products). The Permittee shall comply with these requirements on and after the effective date of 40 CFR 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products).**
  - (2) **The affected source is subject to the provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products), effective the date the**

**rule is published in the Federal Register. Pursuant to 40 CFR 63.3883(b), the Permittee shall comply with these requirements on and after the date that is three years after the effective date of the rule.**

- (3) Pursuant to 40 CFR 63.3910(a), the Permittee shall submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the Permittee. The Permittee must submit these notifications by the dates specified in those sections, except as provided in this condition.**
- (4) Pursuant to 40 CFR 63.3910(b), the Permittee shall submit the Initial Notification no later than one (1) year after the effective date of 40 CFR Part 63, Subpart Mmmm.**
- (5) The Permittee shall submit the Notification of Compliance Status required by §63.9(h) no later than thirty (30) calendar days following the end of the initial compliance period described in §63.3940, §63.3950, or §63.3960 that applies to the affected source. The Notification of Compliance Status must include the information required in §63.3910(c)(1) through (11) and in §63.9(h).**

#### **State Rule Applicability - Entire Source**

##### **326 IAC 1-5-2 (Emergency Reduction Plans)**

The source has submitted an Emergency Reduction Plan (ERP) on August 22, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

##### **326 IAC 2-2 (Prevention of Significant Deterioration)**

Pursuant to T177-6466-00083, issued on September 25, 1998, VOC usage, including coatings, dilution solvents, and cleaning solvents at all surface coating booths (E1, E2, E3, E4, E6, E7, E8, E9, S1, S2, S3, S4, S5, S6, and S9) shall be less than two hundred forty-nine and seven tenths (249.7) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide VOC PTE to less than two hundred fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This source has had no modifications. This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

The VOC PTE for the two (2) natural gas boilers and one (1) steam-generating wood-fired boiler is 0.2 tons per year. Therefore, the surface coating booths are limited to 249.7 tons per consecutive 12 month period, in order to keep source-wide VOC emissions below the 250 ton per year threshold.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

##### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### Surface Coating Operations

##### **326 IAC 6-3 (Process Operations)**

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by U.S. EPA into the Indiana State Implementation Plan (SIP). Therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to T177-6466-00083, issued on September 25, 1998, and 40 CFR 52, Subpart P, the PM from the surface coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Dry filters or equivalent controls shall be in operation at all times the surface coating booths are in operation and shall be operated in accordance with manufacturer's specifications, in order to comply with this limit.

##### **326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

- (a) Pursuant to Construction Permit CP-177-3462-00054, issued September 27, 1994, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the VOC emissions from the metal casket surface coating line, located at Plant 1, consisting of seven (7) surface coating booths, identified as S1, S2, S3, S4, S5, S6, and S9, shall utilize Best Available Control Technology (BACT) in accordance with 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and comply with the following requirements:

- (1) Utilize six (6) High Volume Low Pressure (HVLP) or equivalent spray guns and one (1) electrostatic airless spray gun with a minimum transfer efficiency of 65% for each spray gun.
- (2) High Volume Low Pressure (HVLP) or equivalent spray guns and/or the electrostatic airless spray gun shall be used at all times that the coating line is operated.

The metal casket surface coating line, located at Plant 1, is subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because it was constructed after January 1, 1980, has potential emissions of twenty-five (25) tons or more per year, and is not otherwise regulated by other provisions of 326 IAC 8.

This condition has been updated to include application systems equivalent to or better than HVLP in regards to transfer efficiency and emissions.

- (b) Pursuant to CP-177-3461-00053, issued October 25, 1994, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the metal casket surface coating line, located at Plant 2, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, shall utilize Best Available Control Technology (BACT) in accordance with 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and comply with the following requirements:

- (1) Utilize High Volume Low Pressure (HVLP) or equivalent application equipment at all times that the booths are in operation, with the exception of shading operations.

(HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.)

- (2) Air atomization equipment may be used for shading operations (shading involves the application of a narrow line of coating on the casket).
- (3) Water base primer shall be used for all primer applications due to the significantly reduced concentrations of VOC.

The metal casket surface coating line, located at Plant 2, is subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because it was constructed after January 1, 1980, has potential emissions of twenty-five (25) tons or more per year, and is not otherwise regulated by other provisions of 326 IAC 8.

This condition has been updated to include application systems equivalent to or better than HVLP in regards to transfer efficiency and emissions.

- (c) Pursuant to T177-6466-00083, issued on September 25, 1998, the input VOC usage to the surface coating booth, identified as E6, located at Plant 2, shall not exceed twenty-five (25.0) tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents. Any change or modification which may increase potential emissions in excess of twenty-five (25.0) tons per year shall be subject to the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

The surface coating booth, identified as E6, located at Plant 2, is not otherwise regulated by other provisions of 326 IAC 8, and is subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because it was constructed after January 1, 1980, and has potential emissions of twenty-five (25) tons or more per year. Based on the above limitation, 326 IAC 8-1-6 does not apply.

- (d) The wooden casket surface coating line, constructed in 1979, located at Plant 2, which consists of three (3) surface coating booths, identified as E7, E8, and E9, is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because it was constructed before January 1, 1980.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) is not applicable to the metal surface coating at this source. This rule applies to surface coating of burial caskets (Standard Industrial Classification Code 3995) in or adjacent to a county designated as nonattainment for ozone. This

source is located in Wayne County. Wayne County and all adjacent counties are designated as attainment for ozone.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 (Organic Solvent Emission Limitations) is not applicable to the wooden casket surface coating line, constructed in 1979, located in Plant 2, because the unrestricted potential to emit VOC is less than 100 tons per year.

Listed Insignificant Activities

*Boilers, Two (2) Natural Gas-Fired, One (1) Steam-Generating Wood-Fired*

326 IAC 4-2 (Incinerators)

The steam-generating wood-fired boiler located in Plant 2 uses only untreated, non-coated wood from the insignificant woodworking operation as fuel, and is used to heat the building from October through April. From May through September, the boiler is not used to heat the building, and it exhausts to the atmosphere. The steam-generating wood-fired boiler is not considered to be an incinerator. Pursuant to 326 IAC 1-2-34, an incinerator is defined as an engineered apparatus that burns waste substances with controls on combustion factors including, but not limited to, temperature, retention time, and air. The steam-generating wood-fired boiler is designed to be a source of indirect heating, that is fueled by untreated, unprocessed wood. Therefore, the requirements of 326 IAC 4-2 do not apply.

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), the one (1) steam-generating wood-fired boiler, rated at 0.38 MMBtu/hr heat input, installed in 1973, located at Plant 2, shall be limited to 0.6 pounds per MMBtu heat input. The steam-generating wood-fired boiler is subject to the requirements of 326 IAC 6-2-3 because it was installed before September 21, 1983.

This limitation is based on

- (a) 326 IAC 6-2-3(e). Pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating purposes which has 250 MMBtu/hr heat input or less and which began operation after June 1972, shall in no case exceed 0.6 pounds per MMBtu heat input; and
- (b) the following equation:

$$Pt \leq \frac{C \leq a \leq h}{765 \leq Q^{0.75} \leq N^{0.25}}$$

- Where:
- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter ( $\mu\text{m}^3$ ) for a period not to exceed a sixty (60) minute time period.
  - Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu). For this condition, Pt is 72.4.
  - Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For this condition, the total source maximum operating capacity rating is 0.38 MMBtu/hr.
  - N = Number of stacks in fuel burning operation. For this condition, the number of stacks is one (1).
  - a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input.
  - h = Stack height in feet. For this condition, the stack height is eighty (80) feet.

The steam-generating wood-fired boiler is in compliance with 326 IAC 6-2-3 because it has potential particulate matter emissions of 0.4 pounds per MMBtu heat input.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the one (1) 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1 shall be limited to 0.6 pounds per MMBtu heat input. The natural gas-fired boiler located at Plant 1 is subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because it was installed after September 21, 1983.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the one (1) 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2 shall be limited to 0.6 pounds per MMBtu heat input. The natural gas-fired boiler located at Plant 2 is subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because it was installed after September 21, 1983.

These limitations were based on the following equation:

$$Pt \leq \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. For Q greater than or equal to 10,000 MMBtu/hr, Pt shall not exceed 0.1. For condition (a), Pt is calculated to be 0.7. For condition (b), Pt is calculated to be 0.6.

As each new indirect heating facility is added to a plant Q will increase. As a result, the emission limitation for each progressively newer facility will be more stringent until the total plant capacity reaches 10,000 MMBtu/hr after which the emission limit for each newer facility will be 0.1 lb/MMBtu heat input. The rated capacities for facilities regulated by 326 IAC 12, New Source Performance Standards, shall be included when calculating Q for subsequent facilities. For condition (a), Q is equal to 6.38 MMBtu/hr. For condition (b), Q is equal to 12.38 MMBtu/hr.

Each natural gas-fired boiler is in compliance with 326 IAC 6-2-4 because each boiler has potential particulate matter emissions of 0.002 pounds per MMBtu heat input.

*Woodworking Operation*

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall not exceed 3.6 pounds per hour, when operating at a process weight rate of 1650 pounds per hour.

The pounds per hour limitation is based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$

P = process weight rate in tons per hour

The two (2) cyclones shall be operating at all times the woodworking is in operation, in order to comply with this limit. The woodworking operation is in compliance with this limit because the limited potential to emit is 1.5 pounds per hour.

*Paved and Unpaved Roads and Parking Lots with Public Access*

326 IAC 6-4 (Fugitive Dust Emissions)

Paved and unpaved roads and parking lots with public access are subject to 326 IAC 6-4 (Fugitive Dust Emissions). This is covered in Condition C.5 of the permit.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The surface coating booths have applicable compliance monitoring conditions as specified below:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (2) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S001, S002, S003, S004, S005, S006, S009, E001, E002, E003, E006, E007, E008, and E009 while one or more of the booths are in operation.
  - (3) Monthly inspections shall be performed of the coating emissions from each stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (S1, S2, S3, S4, S5, S6, S9, E1, E2, E3, E4, E6, E7, E8, and E9) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take

response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations).

- (b) The woodworking operation has applicable compliance monitoring conditions as specified below:
  - (1) Daily visible emissions notations of the cyclone stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
  - (2) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
  - (3) In the event that cyclone failure has been observed: Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the unrestricted PTE of the woodworking operation is 43.8 ton PM/yr, and a control is necessary to comply with applicable rules. The two (2) cyclones must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

## Conclusion

The operation of this casket manufacturing and surface coating company shall be subject to the conditions of the attached proposed **Part 70 Permit No. T177-17509-00083**.



**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****Company Name:** J.M. Hutton and Co., Inc.**Address City IN Zip:** 1501 South 8th St., Richmond, Indiana 47375**TVOP:** T177-17509-00083**Reviewer:** Chrystal Wagner**Date:** August 8, 2003**Plant 1**Heat Input Capacity  
MMBtu/hrPotential Throughput  
MMCF/yr

6.0

52.6

Heat Input Capacity includes one (1) natural gas-fired boiler rated at 6.0 MMBtu/hr located at Plant 1; and one (1) natural gas-fired boiler rated at 6.0 MMBtu/hr located at Plant 2.

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.05	0.2	0.0	2.6	0.1	2.2

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****HAPs Emissions****Company Name:** J.M. Hutton and Co., Inc.**Address City IN Zip:** 1501 South 8th St., Richmond, Indiana 47375**TVOP:** T177-17509-00083**Reviewer:** Chrystal Wagner**Date:** August 8, 2003**Plant 1****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.519E-05	4.187E-07	2.617E-05	6.280E-04	1.186E-06

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.745E-07	3.838E-07	4.885E-07	1.326E-07	7.327E-07

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.